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May 31, 2023

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Via ECF

Hon. Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

RE: *Abadi v. NYU Langone Health System, et al.*, 1:21-cv-11073-RA
Letter Motion to So-Order Briefing Schedule on Plaintiff's Motion to Amend

Dear Judge Abrams:

This office represents the Defendants in the above-referenced action. I submit this letter motion to request the Court enter the below briefing schedule that was agreed upon between the parties with respect to Plaintiff's Motion to Amend the Complaint (Dkts. 47, 51). Pursuant to Your Honor's Individual Rule 1(D), Defendants' state the following in support of their application:

1. Plaintiff filed the Motion to Amend on May 14, 2023 (Dkt. 47);
2. On May 16, 2023, this Court denied Plaintiff's application for failing to attach a complete copy of the proposed Amended Complaint (Dkt. 50);
3. On May 18, 2023, Plaintiff filed his proposed Amended Complaint (Dkt. 51);

Defendants respectfully request that the Court enter the below briefing schedule. The reason for this application is that counsel needs to confirm that we are representing all of the proposed Defendants and investigate Plaintiff's allegations into each.

Plaintiff has consented to this request. No party has previously requested an extension of this deadline. This request would not affect any other scheduling dates.

Due to the above, the parties respectfully request that the Court enter the following briefing schedule on Plaintiff's Motion to Amend:

- Defendants' opposition: June 16, 2023
- Plaintiff's reply: June 30, 2023

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Thank you for your consideration of the instant application.

Very truly yours,

HARRIS BEACH PLLC

/s/ Roy W. Breitenbach
Roy W. Breitenbach

Application granted.

RWB:ab

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', written over a horizontal line.

Hon. Ronnie Abrams
United States District Judge
06/01/2023